

**Wittels
McInturff
Palikovic**

October 11, 2024

Via ECF

The Hon. Andrew E. Krause
United States District Court
300 Quarropas St.
White Plains, NY 10601

Re: *Cap 111 Enters. LLC v. Manhattan Beer Distrib., LLC*, No. 22 Civ. 1408 (CS) (AEK)

Dear Judge Krause,

The parties write jointly pursuant to Local Civil Rule 7.1(d) and Your Honor's Individual Practice I.D. to request that the Court extend the stay in this action for an additional 30 days, to Thursday, November 14, 2024. The stay is currently set to expire on Tuesday, October 15.

The reason for this request is that while the parties have made substantial progress in negotiating the final Class Action Settlement Agreement ("Agreement") and developing a notice plan, their negotiations and the joint drafting of the multiple documents needed to effectuate the class action settlement have taken longer than first estimated. The parties need the additional 30 days to complete the work that remains outstanding.

In accordance with Your Honor's Individual Rule I.D, the only specific deadline the parties seek to extend is the current October 15 stay deadline the Court entered on August 19, 2024. ECF No. 181.

This is the parties' first request to extend the stay the Court entered on August 19. All parties consent to the requested stay.

Thank you for the Court's consideration of this request.

Respectfully Submitted,

/s/ Ethan D. Roman
Ethan D. Roman

*Counsel for Plaintiffs and the
Proposed Class*

cc: All Counsel of Record (*via ECF*)